III. REMARKS

Claims 1-14 are pending in this application. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1- 14 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Shear (U.S. Patent No. 5,627,972), hereafter "Shear," in view of Ogawa *et al.* (U.S. Patent No. 5,608,874), hereafter "Ogawa." Applicants respectfully traverse the rejections for the following reasons.

Initially, Applicants respectfully submit that the U.S. Patent Number for the Ogawa reference should be 5,608,874 and not 6,608,874 as recited in the Office Action.

With regard to the 35 U.S.C. §103(a) rejection over Shear in view of Ogawa, Applicants submit that the references cited by the Office do not teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 7, 13 and 14, Applicants submit that Shear fails to teach, *inter alia*, means for analysing the message fields in the representative samples of messages stored in said message log to get a statistical analysis of the values of the message fields. In support of its contention to the contrary, the Office cites a passage of Shear that teaches "...a data interchange system, adapted to receive a message having a first data format, to receivably store the first message, and to translate the received message into a second data structure or format, at a predefined later time." Col. 2, lines 28-32. To this extent, Shear

teaches storing a received message for later translation and not storing a representative message for use in performing the translation.

The Office further cites a passage of Shear that includes "...an archiving system, which allows for the selective storing of message 16, 18," and a separate modeling system that "...includes a model database which is adapted to include, as will be shown, various data models associated with the hierarchical level of message 16. In the preferred embodiment of this invention, these included data models are used to parse and transform message 16 into the format utilized by message 18." Col. 4, lines 6-7, 24-29. To this extent, the archiving system of Shear does not store representative samples of messages, but rather, the message 16 to be translated and the message 18 that has been translated. Shear also does not teach that the messages that are stored using its archiving system are analyzed for use in doing the translation. In fact, Shear does not use its archiving system at all in performing its translation, but rather uses its modeling system. This modeling system of Shear does not use representative messages in its translation, but instead uses data models.

In contrast, the claimed invention includes "...means for analysing the message fields in the representative samples of messages stored in said message log to get a statistical analysis of the values of the message fields." Claim 1. As such, the message log of the claimed invention does not merely allow for selective storing of received and translated messages, as does the archiving system of Spear, but instead stores representative samples. Furthermore, unlike Spear in which messages stored in its archiving system are merely achieved and not used in translating, in the claimed invention, the message fields in the representative samples of the messages stored in the message logs are analysed. Spear does not use analysed data from its archiving system to

perform its translation, but rather data models from its modeling system. Thus, the archiving system and modeling system of Spear does not teach or suggest the means for analysing of the claimed invention. Ogawa does not cure this deficiency. Accordingly, Applicants request that the Office's rejection be withdrawn.

With further respect to independent claims 1, 7, 13 and 14, Applicants respectfully submit that Spear also fails to teach, *inter alia*, responsive to said compatibility determination and said statistical analysis to select the best fit output message field into which to transform a given input message field. As stated above, Spear does not teach any analysis of the messages that are selectively stored in its archiving system. Furthermore, Spear teaches that it is its modeling system and not its archiving system that performs the translation of the message. Col. 4, lines 24-29. To this extent, Spear does not use a statistical analysis of the messages in its archiving system to select the best fit output message field into which to transform a given input message field. Ogawa does not cure this deficiency. Accordingly, Applicants request that the rejection be withdrawn.

With further respect to independent claims 1, 7, 13 and 14, Applicants respectfully submit that Ogawa fails to teach, *inter alia*, getting a statistical analysis of the values of the message fields in the message log. The passage of Ogawa cited by the Office merely teaches that "...logical, statistical and mathematical operations may be performed on the data." Col. 2, lines 64-65. However, these operations are performed on the data itself, and not on representative samples of messages stored in a log file. Furthermore, nowhere in the passage cited by the Office or elsewhere does Ogawa teach or suggest that the operations are used to translate the data from one form to another. In contrast, the claimed invention includes "...means for analysing the

message fields in the representative samples of messages stored in said message log to get a statistical analysis of the values of the message fields." Claim 1. As such, the statistical analysis of the claimed invention is not merely an operation that may be performed on data as in Ogawa, but is instead derived from analysing the message fields in representative samples of messages stored in a message log. Thus, the statistical operation of Ogawa does not teach or suggest the statistical analysis of the claimed invention. Spear does not cure this deficiency. Accordingly, Applicants request that the Office's rejection be withdrawn.

With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the dependent claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However,

Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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Hunter E. Webb
Reg. No.: 54,593

Hoffman, Warnick & D'Alessandro LLC
75 State Strect, 14th Floor
Albany, New York 12207
(518) 449-0044
(518) 449-0047 (fax)

RAD/hew